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UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

REBECCA ALLISON GORDON, JANET)	No. C-03-1779 CRB
AMELIA ADAMS, and AMERICAN CIVIL)	
LIBERTIES UNION FOUNDATION OF)	STIPULATION AND [PROPOSED]
NORTHERN CALIFORNIA,)	ORDER ENLARGING TIME TO
)	FILE MOTION FOR ATTORNEYS'
Plaintiffs,)	FEES (Local Rule 54-6)
v.)	
)	
FEDERAL BUREAU OF INVESTIGATION,)	
TRANSPORTATION SECURITY)	
ADMINISTRATION, and DEPARTMENT OF)	
JUSTICE)	
Defendants.)	

The parties hereby stipulate and agree as follows:

1. On June 29, 2005, this Court entered in the above-captioned matter a judgment in favor of plaintiffs in part in favor of defendants in part.

2. Plaintiffs believe that they are entitled to attorneys' fees pursuant to 5 U.S.C. §552(a)(4)(E).

3. On October 24, 2005, the Court signed a Stipulation and Order which enlarged the time for plaintiffs to file a motion for attorneys' fees until January 15, 2006.

4. The parties have engaged in good faith negotiations in an effort to resolve the issues relating to plaintiffs' anticipated motion for attorneys' fees without further litigation; however, the parties have not yet reached a final agreement that has been approved by all of the defendant agencies.

5. The parties anticipate that settlement negotiations can be concluded within two weeks after the date of this Stipulation.

6. To allow sufficient time for plaintiffs to prepare and file a motion for attorneys' fees if no final agreement is reached, the parties respectfully seek an order enlarging the time for plaintiffs to file a motion for attorneys' fees until February 24, 2006.

Dated: January 10, 2006

THOMAS R. BURKE
SUSAN E. SEAGER
DAVIS WRIGHT TREMAINE LLP

AMERICAN CIVIL LIBERTIES UNION OF
NORTHERN CALIFORNIA

By: /s/ Thomas R. Burke
Attorneys for Plaintiffs Rebecca Allison Gordon,
Janet Amelia Adams, and American Civil Liberties
Union Foundation of Northern California

U.S. DEPARTMENT OF JUSTICE

By: /s/ Joseph LoBue
Attorneys for Defendants FBI and Transportation Security
Administration

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: January 12, 2006

Hon. Charles R. Breyer
U.S. District Judge

